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NEVADA CORPORATE HEADQUARTERS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA CORPORATE HEADQUARTERS,
A Nevada Corporation

Plaintiff,

vs.

JANETTE M. HILL; JOHN DOE;
ATTORNEY DOE; and DOES I through X and
ROE Corporations or Business Entities I
through X, inclusive,

Defendants.

Case No.: 20-CV-01721-RFB-VCF

**STIPULATED REQUEST & PROPOSED
ORDER TO RESCHEDULE EARLY
NEUTRAL EVALUATION SESSION**

(FIRST REQUEST)

(Before Magistrate Nancy J. Koppe)

JANETTE M. HILL, individually,

Counterclaimant,

vs.

NEVADA CORPORATE HEADQUARTERS,
A Nevada Corporation, JASON WILLIAMS,
individually, ALFONSO VALLE, individually,

Counter-Defendant.

1 Plaintiff/Counter-Defendant NEVADA CORPORATE HEADQUARTERS s (hereinafter
2 “Plaintiff” or “Counter-Defendant”) by and through its counsel, Jackson Lewis P.C., and
3 Defendant/Counterclaimant JANETTE HILL (hereinafter “Defendant” or “Counterclaimant”) by
4 and through her counsel, Lagomarsino Law, and Counter-Defendant ALFONSO VALLE
5 (hereinafter “Counter-Defendant”) by and through his counsel of record, Gordon Rees Scully
6 Mansukhani, LLP, hereby submit this stipulated request to reschedule the Early Neutral
7 Evaluation currently scheduled for November 9, 2020.

8 Plaintiff’s counsel recently had a death in the family and Defendant’s counsel has been out
9 of the office for medical reasons. In addition, Plaintiff’s Answer to the Counterclaim was filed
10 October 29, 2020. The parties’ initial 26(f) discovery conference is scheduled on November 4,
11 2020, just five days before the ENE. The parties have not yet exchanged initial disclosures. For
12 these reasons, the parties request that the ENE be rescheduled to a later date to ensure that all
13 parties have an opportunity to exchange disclosures and thoroughly evaluate the claims and
14 defenses so that they can effectively prepare for and participate in a meaningful evaluation
15 session.

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1 This stipulation and order is sought in good faith and not for the purpose of delay. This is
2 the first request to continue the Early Neutral Evaluation Conference.

3 Dated this 30th day of October, 2020.

4 LAGOMARSINO LAW

JACKSON LEWIS P.C.

5 /s/ Andre M. Lagomarsino

/s/ Lisa A. McClane

6 ANDRE M. LAGOMARSINO, ESQ.

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9 Attorney for Defendant/Counterclaimant

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10 GORDON REES SCULLY MANSUKHANI,
11 LLP

12 /s/ Robert S. Larsen

13 ROBERT S. LARSEN, ESQ.,

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14 DIONE C. WRENN ESQ.

Nevada Bar No. 13285

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16 Attorneys for Counter-Defendant

17 Alfonso Valle

18 **ORDER**

19 IT IS HEREBY ORDERED that the Early Neutral Evaluation Conference scheduled on
20 November 9, 2020 at 9:30 AM, is rescheduled to December 7, 2020 at 9:30 AM.

21 Confidential written statements shall be submitted to chambers no later than November 30,
22 2020. All other requirements set forth in the order at Docket No. 5 remain in place.
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25 U.S. Magistrate Judge